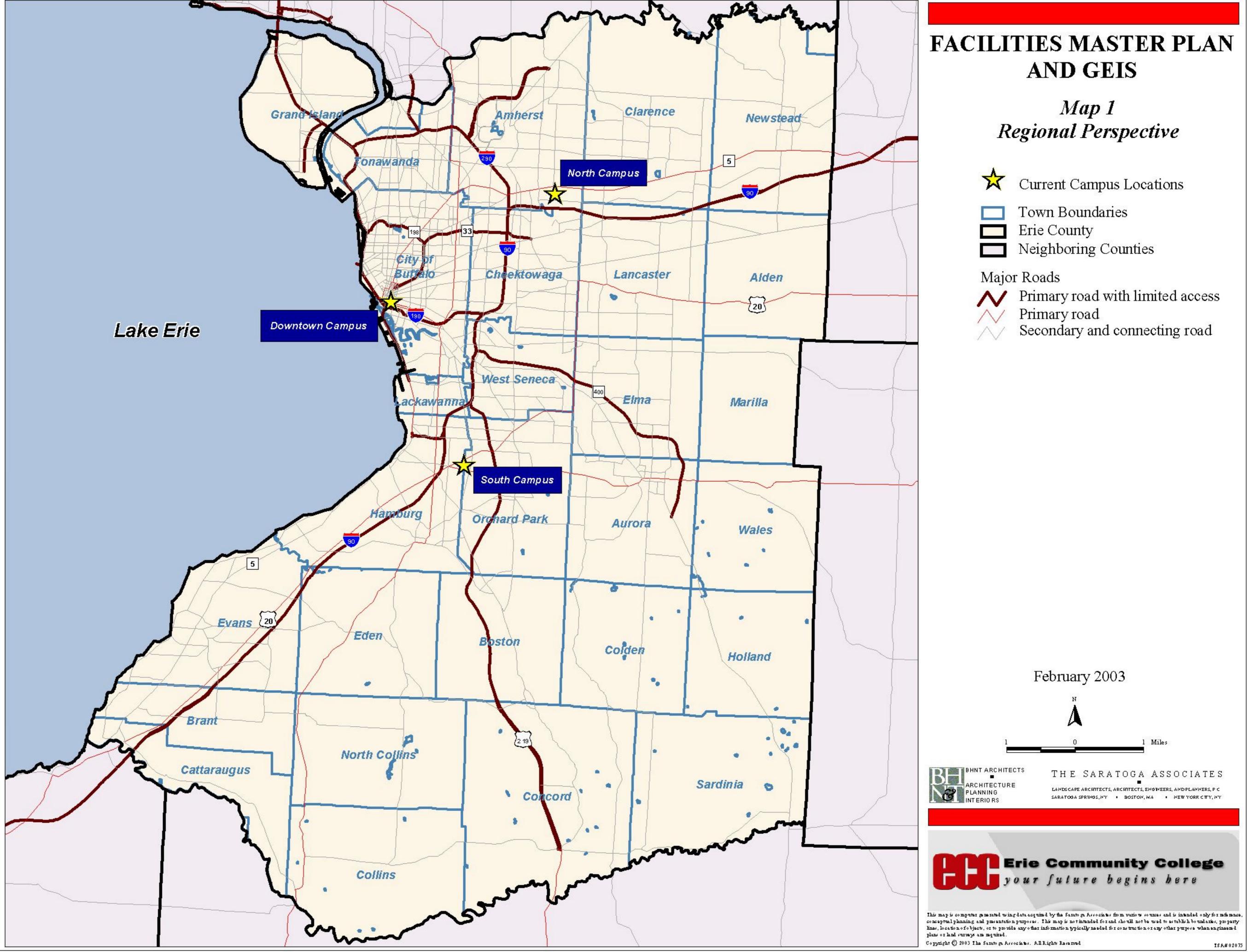
14-12-8 (3/99)-9c SEQR

State Environmental Quality Review Notice of Completion of Draft / Final EIS

Project Nur	mber	Date:
	notice is issued pursuant to Part 617 of t ate Environmental Quality Review Act) o	he implementing regulations pertaining to fixed the Environmental Conservation Law.
accepted by	v the	al Impact Statement has been completed and, as lead agency,
for the prope	osed action described below.	
	oraft EIS: Comments on the Draft EIS are son until	
Name of Ac	ction:	
Description	of Action:	
Location:	(Include street address and the name of appropriate scale is also recommended	of the municipality/county. A location map of d.)

SEQR Notice of Completion of Draft / Final EIS	Page 2 of 2				
Potential Environmental Impacts:					
A copy of the Draft / Final EIS may be obtained from:					
Contact Person:					
Address:					
Telephone Number: A copy of this notice must be sent to:					
Department of Environmental Conservation, 50 Wolf Road, Albany, New York 12233-175	50				
Chief Executive Officer,of Buffalo, Orchard					
Any person who has requested a copy of the Draft / Final EIS					
Any other involved agencies					
Environmental Notice Bulletin					
Copies of the Draft/Final EIS must be distributed according to 6NYCRR 617.12(b).					

ATTACHMENT A LOCATION MAP



ATTACHMENT B

POTENTIAL ENVIRONMENTAL, SOCIAL AND ECONOMIC IMPACTS

POTENTIAL ENVIRONMENTAL, SOCIAL AND ECONOMIC IMPACTS

ALTERNATIVE 1

1. ECC's Mission and Goals/Quality of Education and Deliverability

Alternative 1 would be consistent with ECC's Mission and all but one of the Institutional Goals, as it would result in positive impacts on the quality and deliverability of education. Alternative 1 is inconstant with Institutional Goal number 9 as it maintains the utility and financial redundancies that burden ECC financially, and due to the fact that only minor relief to the institution's inefficiencies may be provide through Alternative 1, this alternative will continue to result in adverse impacts on the financial assets of the institution

2. Job Creation and Associated Payroll Impacts

While ECC may only see a minor increase in staff and faculty, Alternative 1 will result in modest positive impacts on the local and regional socioeconomic conditions as a result of the proposed construction projects. The additional students projected under Alternative 1 will also result in minor spending impacts on the surrounding communities. The sale and redevelopment of the VTTC site could provide the most tangible economic benefits under Alternative 1 by resulting in an additional 45 jobs with associated estimated payroll impacts of \$1.5 million annually by 2015. Therefore, in aggregate, Alternative 1 will result in positive job creation and related payroll impacts on the surrounding communities, requiring no mitigation

3. Annual County Property Tax Revenue

Under Alternative 1, ECC will retain all three Campuses, which will continue to preclude County tax revenue from being generated by private development on each Campus. However, Alternative 1 proposes the sale of the VTTC site in Orchard Park. Private development on the 6.6-acre VTTC site is projected to result in \$2,500 in annual property taxes for Erie County. In aggregate, the sale of the VTTC and resulting private development under Alternative 1 will result in a minor positive impact on Erie County's fiscal conditions, requiring no mitigation.

4. Annual Property Tax Revenue

Alternative 1 will not directly result in any additional property tax revenue for the Towns of Amherst, Hamburg, and the City of Buffalo, as the three Campuses will be retained. The conveyance of the VTTC site is projected to result in \$38,000 in annual local property and school taxes for the Town of Orchard Park at full build-out of the site in 2015, a minor positive impact on the Town's fiscal conditions, requiring no mitigation.

5. Revenue from the Sale of the VTTC

The sale of the VTTC could result in approximately \$1.26 to \$1.57 million in revenue for ECC and Erie County, a positive impact on the fiscal resources for ECC and the County, requiring no mitigation.

6. ECC Operations and Management

Under Alternative 1, some minor energy and staffing efficiencies could be realized as programs are reorganized; however, the current three-campus configuration will be maintained, resulting in certain inefficiencies, an adverse impact on the fiscal resources of ECC. Mitigation in the form of additional program reorganization and consolidation would provide some relief. This mitigation strategy will need further analysis to identify the programs and departments appropriate for reorganization and consolidation.

7. Enrollment

Alternative 1 will result in positive impacts on enrollment and in turn will have positive effects on ECC's fiscal resources. Therefore, no mitigation will be required.

8. Chargebacks

The approximate \$0.7 million reduction in chargebacks as a result of the projected increase in student enrollment under Alternative 1 is a positive impact; therefore, no mitigation is required.

9. Tuition and State Aid

The estimated benefit on the projected increase in enrollment under Alternative 1 is approximately \$2.2 million per year, a positive impact, and as such, no mitigation will be required.

10. Student Costs

During the implementation of Alternative 1 and as ECC introduces newer and state-of-the-art facilities to its students, periodic increases in tuition may be necessary to meet the financial needs of ECC. While this may be considered an adverse impact with no mitigation, the new and state-of-the-art facilities that ECC will be providing will serve to off-set the impact of increasing tuition. Furthermore, ECC remains one of the lowest-priced secondary educational institutions in the region.

11. Transportation

Traffic Circulation

Due to the fact that the projected increase in student enrollment through 2015 will be approximately 5 percent, well below planning averages for growth on the regional highway network, and due to the fact that anticipated regional transportation improvements as identified in DGEIS Section 4.1.2.2 Proposed Transportation Projects, should alleviate these normal growth trends, any impacts on the regional transportation network resulting from Alternative 1 are anticipated to be minimal

Commuter Times

The implementation of Alternative 1 will not directly result in adverse impacts on student travel times. Future impacts may occur as a result of non-ECC-related development in and around each Campus. These impacts would be out of the control of ECC.

12. Public Safety

Due to the ability of the ECC Public Safety Department to accommodate the projected enrollment increases with no additional staff, no significant impacts related to Campus safety are anticipated as a result of the proposed increase in student enrollment under Alternative 1.

13. Air Resources

Due to the fact that there will be only marginal increases in students and associated vehicle trips through the year 2015, combined with the fact that any increase in emissions from the heating plants on each Campus will be in full compliance with local, state, and federal rules, regulations, and guidelines, specifically 6 NYCRR Part 201, Alternative 1 is not anticipated to result in significant adverse impacts on the region's air resources.

However, the projected increases in students and associated vehicle trips, when combined with continued local and regional growth, may result in cumulative impacts on the local and regional air resources. Refer to DGEIS Section 5.1.2.6 Cumulative Impact Analysis for further analysis on potential cumulative impacts.

14. Environmental Justice

Minority and low-income residents in the City of Buffalo are currently at a disadvantage when it comes to accessing post-secondary education, since the City Campus does not offer the same courses and programs provided at the suburban Campuses, and because these residents rely more heavily on public transportation which severely limits their ability to commute to the suburban Campuses. Through the offering of free NFTA access for any student interested, and by offering certain programs at all campuses, which are currently offered at only one campus, may mitigate the current Environmental Justice impact. However, this will require additional costs to be incurred by ECC exceeding \$2.5 million, which when combined with the current O&M expenses required under the three-campus scenario, would be an impracticable form of mitigation and not feasible.

15. Unavoidable Adverse Impacts

Under Alternative 1, the unavoidable adverse impacts include the operation and maintenance-related fiscal impacts on ECC; City students' lack of equal access to ECC courses and programs not offered at the City Campus, an Environmental Justice issue; and the cumulative impacts of supporting the trend of suburbanization, automobile dependency the outward migration of the City population and the numerous associated secondary impacts.

College Fiscal Resources

Alternative 1 proposes maintaining the current three-campus structure, which is currently and will continue to be inefficient and financially stressful, an adverse impact on ECC's fiscal resources. Furthermore, the utility and maintenance requirements under the three-campus system adds to ECC's financial burden.

While Alternative 1 proposes some program reorganization and consolidation, it would provide minimal relief to the adverse fiscal impacts of a three-campus system. Furthermore, the sale of the Vehicle Technology Training Center and consolidating it to the main South Campus would provide some additional revenue to ECC. However, the cost associated with relocating the center would likely off-set any overall cost savings.

Significance of Impacts

Therefore, under Alternative 1, the adverse impacts on ECC's fiscal resources cannot be substantially mitigated and avoided.

Environmental Justice

Due to the higher percentage of lower income residents and higher dependency on public transportation, City residents are placed at a disadvantage when it comes to educational accessibility. Under the current and proposed three-campus arrangement of Alternative 1, impediments to an equal distribution of courses and programs will be confirmed.

A continuation of such practices is inconsistent with ECC Institutional Goal number 1 "Academic," which states that ECC is to "offer current, continuously assessed academic programs that serve the needs of a diverse student population." In addition, the current campus arrangement is inconsistent with ECC's initiatives in workforce development in Western New York. Specifically, the leadership role of ECC, "Providing job skill retraining for the presently unemployed," is sharply diminished under the current campus configuration.

Significance of Impacts

Minority and low-income residents in the City of Buffalo are currently at a disadvantage when it comes to accessing post-secondary education, since the City Campus does not offer the same courses and programs provided at the suburban Campuses; therefore, these residents rely more heavily on public transportation which severely limits their ability to commute to the suburban Campuses. Alternative 1 does not address this deficiency as the three-campus arrangement will be maintained and no major reallocation of courses and programs are proposed. Offering free access to the NFTA system combined with providing certain programs at all three campuses as discussed in more detail above in DGEIS Section 5.1.2.5 Environmental Justice, will cost the College more than \$2.5 million dollars. When combined with the current O&M costs required under a three-campus system, this additional expense is impracticable. Therefore, is a significant impact, which, under the current Alternative 1 proposal, cannot be fully mitigated.

Cumulative Impacts

The three-campus system promotes continued suburbanization, and when combined with additional projects that are automobile oriented, such as malls, big-box stores, etc., the trend of suburbanization is continually supported. Adverse

impacts on traffic congestion, quality of life, air quality, and numerous additional issues arise and existing ones are exacerbated.

This is a cumulative impact that cannot be directly fully mitigated by ECC under Alternative 1. This impact can be partially mitigated however, if ECC were to provide and aggressively promote free public transportation for all students. Increased use of public transportation could offer some mitigation to cumulative traffic and air quality impacts, but it will not alleviate the potential for students to continue to be dependent upon their automobiles and contribute to the trend of sprawl and suburbanization.

The three-campus system cumulative promotes the trend of outward migration from urban areas. Cumulatively, suburbanization impacts the City through population loss, the associated fiscal and social implications and the ultimate deterioration of the City's economic and social well-being.

Continuing with the three-campus configuration under Alternative 1 only serves to exacerbate this phenomenon, with no direct mitigation measures available.

ALTERNATIVE 2

1. ECC's Mission and Goals/Quality of Education and Deliverability

Alternative 2 will be consistent with ECC's Vision, Mission, and Core Values and will bring ECC closer to achieving its Institutional Goals, all positive impacts requiring no mitigation.

2. Job Creation and Associated Payroll Impacts

The total estimated job growth under Alternative 2 as a result of private development on the suburban Campuses ranges between 6,000 and 11,000 jobs, with estimated total payroll impacts ranging from \$182 million to \$456 million.

In addition, the projected \$2 million increase in spending power which could translate into at least 30 to 40 food market and services jobs around the consolidated City Campus is a significant positive economic impact.

Furthermore, a consolidated Campus with more than 10,000 students would likely attract additional companies to the area seeking college-aged and educated employees. While it is impractical to estimate the actual types and number of businesses that might locate around the City Campus, businesses hiring the college-age demographic such as support centers and back office call centers could provide salaries ranging from \$18K to \$40K. These employment and associated payroll impacts could also be significant.

Lastly, the opening of the suburban Campus to private development, with the end result of providing thousands of new employment opportunities and the associated significant positive payroll impacts on the surrounding communities, coupled with the positive economic impacts anticipated through catalytic development around the consolidated City Campus, are considered results consistent with ECC's Core Value of being committed to "...the needs of our community and the well-being of the College."

Due to the numerous positive local job growth and payroll impacts associated with Alternative 2, no mitigation is required.

3. Annual County Property Tax Revenue

The projected revenue for Erie County under full build-out of the selected Development Scenarios at the suburban Campuses will in aggregate range from \$0.58 million to \$1.8 million annually. Due to the fact that currently no County property taxes are generated from the suburban Campuses, as they are both owned by ECC and Erie County, opening the Campuses to private development will provide new tax revenue which could potentially be allocated, in part, to fund ECC-related initiatives and improve the quality of the education through continued upgrading of ECC facilities and technology. Additionally, this added revenue stream may aid in off-setting the fiscal implications of a drop in enrollment under Alternative 2. This new County tax revenue is a positive impact on the County's fiscal resources, and therefore, no mitigation is necessary.

4. Annual Property Tax Revenue

The estimated property tax revenue the local communities and school districts could begin retaining by the year 2015 under Alternative 2 and the selected Development Scenarios at each suburban Campus ranges from \$4.7 to \$14.5 million annually. This projected property tax revenue is a significant positive economic benefit to the local communities and school districts requiring no mitigation.

5. Revenue from the Sale of the Suburban Campuses

The total projected revenue from the sale of the suburban Campuses, with the development density potential analyzed within the selected Development Scenarios, stands at between \$11.4 and \$19.7 million, a positive impact on both ECC's and Erie County's fiscal resources, with the potential to off-set the potential fiscal impacts associated with a projected drop in enrollment. Therefore, no mitigation is required.

6. ECC Operations and Management

The projected \$3.2 million in O&M savings under Alternative 2 is a positive impact and would aid in off-setting potential adverse implications associated with a drop in enrollment described below. Therefore, no mitigation is necessary.

7. Enrollment

Due to the fact that properly placed extension centers would likely help ECC retain students taking nine credits and under, and possibly attract additional students in this group, combined with the potential for a future increase in enrollment after full build-out, the numerous economic and fiscal benefits associated with the closing of the suburban Campuses and a consolidated Downtown Campus and the likely increase in the amount of the ECC operating budget being invested in the classroom resulting in an improved quality of education, the projected drop in enrollment is not considered a significant impact.

8. Chargebacks

While the projected loss of students in the over nine credit group is the most difficult to mitigate under Alternative 2, it is likely that once the City Campus is in operation, its state-of-the-art facilities, combined with an enhanced educational

program offering, including partnerships with the BNMC including the University at Buffalo Center for Bioinformatics, UB South (medical/dental) Campus, and ECMC, will act to attract additional students from this group.

ECC would be able to recapture the nine credits and under group, an estimated 409 FTEs through extension centers, thus partially mitigating the projected increase in the chargeback figures. However, the majority of these students are in the under 9 credit group and are not necessarily the group of students that would be attending a community college outside of ECC if the suburban campuses were to close.

The estimated increase in chargebacks under Alternative 2 would be further mitigated through the numerous economic benefits of a consolidated Campus and opening of the suburban Campuses to private development, thus resulting in significant local and regional economic impacts. Taking the numerous positive economic benefits of a consolidated Downtown Campus into account, the projected drop in enrollment and associated ECC fiscal implications are not anticipated to be significant.

9. Tuition and State Aid

Alone, the estimated annual loss of tuition and state aid of \$ 3.35 million would be considered an adverse fiscal impact on ECC. However, through the use of extension centers which will off-set the projected drop by approximately \$1.3 million, coupled with the countless economic benefits of a consolidated Campus, the projected loss in tuition and state aid is not anticipated to be significant.

10. Student Costs

Due to the fact that adequate surface parking currently exists in the immediate vicinity of the proposed consolidated Campus to meet the demand of parking under Alternative 2, along with the fact that the projected cost of parking, which may be passed off to students, can be dramatically reduced through public-private partnerships, alternative means of financing, and a rearrangement of the class schedules to alter the peak times for parking, Alternative 2 will not result in significant adverse impacts on student parking around a consolidated Downtown Campus.

11. Transportation

Traffic Circulation

Figure 5.2.2-7 Alternative 2 Highest Traffic Impacts (2015) presents the highest impact roads for Alternative 2. No Interstate or Collector Roadways will surpass LOS D or LOS E thresholds as a result of Alternative 2. As a result, these are all reported as not having a significant impact on the roadway segment, in accordance with the GBNRTC study guidance provided.

Of these highway segments, five are projected to operate over LOS F in 2015, even without impacts of this project considered. These segments, and the percent increase in traffic projected by Alternative 2, are identified in the Table.

Significantly, the Elm/Oak arterial, adjacent to ECC City Campus and connecting I-190 with NY 33 (Kensington Expressway), will see a 25 percent increase in traffic, which will result in the corridor exceeding the GBNRTC LOS E threshold post-project in 2015. This arterial collects traffic from I-190 to the north and east, NY 33 to the northeast, and

NY Route 5 from the south. This increase in traffic would result in delays and backups along the corridor, mainly during peak AM periods.

With additional targeted traffic analysis and the implementation of designated turn lanes and, optimized signal timings, the adverse impacts on the Elm/Oak Corridor are not anticipated to be significant.

Commuter Times

A comparison of average travel times for students indicates that Alternative 2 would increase average student travel time by three minutes, or about a 15 percent increase. Suburban and rural students would see increases of 12 to 15 minutes in travel time, while City students currently attending suburban Campuses would see about a five-minute reduction in travel time.

The results identify that an average trip today from doorway to Campus takes about 18 minutes (this would also be expected for Alternative 1). Travel times under Alternative 2, on average, would increase to 21 minutes. When suburban Campus students alone are looked at, the figures are 19 minutes (Alternative 1) and 22 minutes (Alternative 2), respectively.

Of significance, rural and outward suburban students would see travel times increase by 12 to 15 minutes. This is mathematically off-set by City Campus students, who would actually see a five-minute average reduction in travel time to reach the City Campus. Refer to Table 5.2.2-10 Travel Times For Students By Campus, By Town for additional information on these travel time analysis results.

With the provision of extension centers, which will continue to provide reasonable commuting times for students taking nine credits and under, and possibly decrease the commuting times for other students originating from the outlying areas of the County and beyond, and the fact that the commute time for students originating from the City's surrounding townships is likely to decrease, in aggregate, the impacts on commuter times under Alternative 2 will not be significant, and will in fact be likely to result in positive impacts for a majority of students.

Public Transportation

The current metro bus and rail configuration can adequately handle the projected additional student load. However, due to the fact that actual future student origins cannot be predicted, some routes might require capacity adjustments to accommodate these riders, but the number of routes affected would be expected to be slim. This projected increase in ridership is not anticipated to result in significant impacts provided any necessary capacity adjustments are made.

12. Parking

Due to the fact that adequate surface parking currently exists in the immediate vicinity of the proposed consolidated Campus to meet the demand of parking under Alternative 2, along with the fact that the projected cost of parking that may be passed off to students can be dramatically reduced through public-private partnerships and alternative means of financing, and with the introduction of a free metro pass program, Alternative 2 will not result in significant adverse impacts on student parking around a consolidated Downtown Campus.

13. Public Safety

A consolidated Downtown Campus combined with the increase in the number of students at the City Campus, both present additional security issues. However, with the numerous safety and security features of the proposed new campus buildings, combined with the use of CPTED in the planning and design of the City Campus, the additional training and "peace officer" status for the ECC Public Safety Officers, continued coordination with local law enforcement authorities, and the presence of over 200 Public Safety employees including City Police Officers and the County Sheriff, impacts on the ability of ECC to provide for the safety and security of students, faculty, staff, and visitors are not anticipated.

14. Air Resources

The increase in automobile traffic may result in localized and cumulative impacts on air quality. The use of public transportation may mitigate these impacts to a certain extent. Beyond the use of public transportation, the potential air quality impacts related to automobile trip increases cannot be further mitigated directly by ECC and Erie County.

The use of a heating and cooling district would mitigate the amount of emissions (pollution and heat) that would be emitted from the City Campus. The process that is ultimately chosen will be the most efficient and cleanest process available, while at the same time the most economically feasible for ECC and Erie County. Furthermore, any increase in emissions from the City Campus will be in full compliance with local, state, and federal rules, regulations, and guidelines, specifically 6 NYCRR Part 201.

15. Environmental Justice

Alternative 2 will alleviate the Environmental Justice impact the results with a three-campus system which limits the program choice for the City's disadvantaged population as discussed above in DGEIS Section 5.1.2.6.

16. Unavoidable Adverse Impacts

Alternative 2 will result in the degradation of the Elm Street/Oak Street arterial to LOS F, with an expected increase of 25 percent traffic on the corridor. During the design of a Campus, a detailed assessment of this corridor would be required. Mitigation could include new turn lanes at Campus intersections, but this would need to be balanced against constraints to maintain sidewalks. Walks on one side of the corridor may need to be closed. Where new Campus building occurs, setbacks would be proposed which would allow for suitable capacity of the roadway with pedestrian accommodations.

This Alternative consolidates ECC at its Downtown Campus. Environmental (hazardous materials and asbestos) costs for the North and South Campuses would be zero if the property and buildings are sold "as-is." However, the potential liability associated with, in particular, residual petroleum products and asbestos, would reduce the sale price of the property.

Therefore, environmental remediation and abatement costs to fully remedy each Campus have been developed to provide an order of magnitude cost for this work. North Campus costs may be on the order of \$1,500,000. For the South Campus remediation and abatement, costs may be on the order of \$750,000.

Procuring and remediating up to nine new pieces of property may lead to environmental cleanup costs on the order of \$2,100,000 to \$2,600,000, based on potential recognized conditions identified during the screening. Any other identified conditions could result in possible additional remediation costs.

Therefore, total environmental costs for this Alternative may be on the order of \$4,350,000 to \$4,850,000. *Table 5.2.3-15* summarizes these costs.

ALTERNATIVE 3

1. ECC's Mission and Goals/Quality of Education and Deliverability

Alternative 3 would be consistent with ECC's Mission and all but one of the Institutional Goals, as it would result in positive impacts on the quality and deliverability of education.

Alternative 3 is inconstant with Institutional Goal number 9 as it maintains the utility and financial redundancies that burden ECC financially, and, due to the fact that only minor relief to the institution's inefficiencies may be provided through the use of P3s and some minor program and personnel reorganizations under Alternative 3, this Alternative will continue to result in adverse impacts on the financial assets of the institution.

2. Job Creation and Associated Payroll Impacts

While ECC may only see a minor increase in staff and faculty, Alternative 3 will result in modest positive impacts on the local and regional socioeconomic conditions as a result of the proposed construction projects and potential private development through P3s. The additional students projected under Alternative 3 will also result in minor spending impacts on the surrounding communities. The sale and redevelopment of the VTTC site could provide the most tangible economic benefits under Alternative 3 by resulting in an additional 45 jobs with associated estimated payroll impacts of \$1.5 million annually by 2015. Therefore, in aggregate, Alternative 3 will result in positive job creation and related payroll impacts on the surrounding communities, requiring no mitigation.

3. Annual County Property Tax Revenue

Under Alternative 3, ECC and Erie County would enter into P3s, which could include the sale of all, or portions of, the suburban Campuses for private development. This would generate County Tax revenue for property that currently does not produce said tax revenue, since it is owned by the County. In addition, Alternative 3 proposes the sale of the VTTC site in Orchard Park. Private development on the 6.6-acre VTTC site is projected to result in \$2,500 in annual property taxes for Erie County. In aggregate, the potential sale of all or portions of the suburban Campuses and the sale of the VTTC and resulting private development under Alternative 3 will result in a positive impact on Erie County's fiscal conditions, requiring no mitigation.

4. Annual Property Tax Revenue

Alternative 3, with the use of sale-leaseback P3s options, would result in an undetermined amount of Town/Village and school tax revenue for each involved community. The conveyance of the VTTC site is projected to result in \$38,000 in

annual local property and school taxes for the Town of Orchard Park at full build-out of the site in 2015. Combined, Alternative 3 would result in positive impacts on each involved communities' fiscal conditions, requiring no mitigation.

5. Revenue from the Sale or Lease of All or Portions of the Suburban Campuses and the VTTC under P3s

The sale of all of the suburban Campuses and the VTTC site could result in between \$11.3 and \$20.57 million dollars in revenue for ECC and Eric County (lease revenue from the Campuses is currently unknown and would have to be negotiated), resulting in positive impacts on the fiscal resources for ECC and the County, requiring no mitigation.

6. ECC Operations and Management

Under Alternative 3, some minor energy and staffing efficiencies could be realized as programs are reorganized; however, the current three-campus configuration will be maintained resulting in certain inefficiencies, an adverse impact on the fiscal resources of ECC. Mitigation in the form of additional program reorganization and consolidation would provide some relief. This mitigation strategy will need further analysis to identify the programs and departments appropriate for reorganization and consolidation.

7. Enrollment

Alternative 3 will result in positive impacts on enrollment and, in turn, will have positive effects on ECC's fiscal resources. Therefore, no mitigation will be required.

8. Chargebacks

The approximate \$0.6 million reduction in chargebacks as a result of the projected increase in student enrollment under Alternative 3 is a positive impact; therefore, no mitigation is required.

9. Tuition and State Aid

The estimated benefit on the projected increase in enrollment under Alternative 3 is approximately \$2.2 million per year, a positive impact, and as such, no mitigation will be required.

10. Student Costs

During the implementation of Alternative 3 and as ECC introduces newer and state-of-the-art facilities to its students, periodic increases in tuition may be necessary to meet the financial needs of ECC. The use of P3s, however, may off-set potential additional costs to students, along with the new and state-of-the-art facilities that will be provided to students. Furthermore, ECC remains one of the lowest-price secondary educational institutions in the region.

11. Transportation

Due to the fact that the projected increase in student enrollment through 2015 will be approximately 5 percent, well below planning averages for growth on the regional highway network, combined with the fact that full build-out of the student housing complexes would likely off-set the impact a five percent enrollment increase over 13 years would have on the

transportation system, any impacts on the regional transportation network resulting from Alternative 3 are anticipated to be minimal.

12. Public Safety

Due to the ability of the ECC Public Safety Department to accommodate the projected enrollment increases with no additional staff, and the above discussed mitigation measures and provisions to deal with on-campus student housing, no significant impacts related to campus safety are anticipated under Alternative 3.

13. Environmental Justice

The potential Environmental Justice (EJ) implications on the City of Buffalo under Alternative 3 would be identical to the potential EJ impacts discussed under Alternative 1.

14. Unavoidable Adverse Impacts

This Alternative is similar to Alternative 1 except some funding would be from a P3. There are no unavoidable adverse impacts relating to transportation facilities or student access under Alternative 3.

Under this Alternative, potential environmental costs for the North Campus would be on the order of \$900,000. At the South Campus, potential cleanup costs may be on the order of \$500,000. Here, too, a nominal contingency of \$100,000 has been included for the City Campus development (single block north of the Flickinger Center).

Total environmental cleanup and abatement costs may be on the order of \$1,500,000 for this Alternative. Abatement would suitably mitigate environmental issues.